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University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7381

October 21, 1987

RP:0080

U.S. EPA Region 9
Attn: Vern Christianson (T-2-2)
Toxic Waste Management Division
215 Fremont Street
San Francisco, California 94105

Dear Mr. Christianson:

Draft Permit
Pearl Harbor Hazardous Waste Facility
Pearl Harbor, Oahu

The Environmental Center has conducted a review of the above referenced document with the assistance of Harlan Hashimoto, School of Public Health; Roy Takekawa, Environmental Health and Safety Office; and Jennifer Crummer and Jacquelin Miller, Environmental Center. The project involves the establishment of a hazardous waste facility in the Pearl Harbor Naval Base.

Our primary concerns with the project emerge from the project's location. Under the provisions of the Superfund Amendments and Reauthorization Act of 1986 (SARA), locating the proposed hazardous waste facility within an area of dense population is likely to create difficulties in compliance with Title III, The Emergency Planning and Community Right to Know Act. For instance, the more complex the neighboring community, the more difficult becomes the task of notifying people adjacent to the facility in a timely manner of an accidental release of toxic material. Furthermore, Title III requires the determination of all known or anticipated acute or chronic health risks associated with an emergency. Inclusion of a large number of elementary school children in that risk assessment complicates the process as a consequence of the greater sensitivity of young children to accidental toxic exposures.

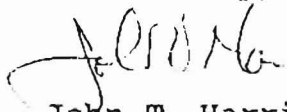
Siting the facility in such a way as to have the main access route adjacent to the school fence and the loading dock facing the school property seems ill-considered and unwise in view of hazards associated with transportation and handling of the proposed volume of waste materials. This does not seem an appropriate location for such a facility.

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Finally, it is apparent that this project constitutes a major Federal action significantly affecting the quality of the human environment. Under provisions of the National Environmental Policy Act (NEPA), it is incumbent on the proposers of the activity either to prepare an Environmental Assessment (EA) and a draft Finding of No Significant Impact (FONSI) or to submit a Federal Environmental Impact Statement for review by appropriate Federal and State Agencies and by the affected public. In addition to issues cited earlier, forthcoming environmental documentation should address the subject of ultimate disposal of the hazardous wastes which this facility is intended to house.

We thank you for the opportunity to comment on this document. We look forward to your consideration of our comments.

Yours truly,



John T. Harrison
Environmental Coordinator

cc: OEQC

L. Stephen Lau
Harlan Hashimoto
Roy Takekawa
Jennifer Crummer

bcc: James Maragos